

September 13, 2019

Mr. Kome Ajise, Executive Director
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

RE: COMMENTS ON THE PROPOSED 6TH CYCLE REGIONAL HOUSING NEEDS
ASSESSMENT (RHNA) METHODOLOGY

Dear Mr. Ajise,

Thank you for the opportunity to provide comments regarding the 6th Cycle RHNA Methodology. The City of San Buenaventura acknowledges the difficult task the Southern California Association of Governments (SCAG) has in developing a methodology to fairly and equitably allocate housing growth targets across our vast and diverse region while also complying with State law.

In general, the City concurs with letters you received from the California Chapter of the American Planning Association (APA), the Los Angeles Chapter of the California APA, the City of Oxnard, and the City of Los Angeles.

The City of San Buenaventura's recommendations for the SCAG RHNA Methodology are:

1. **Emphasize Greenhouse Gas Reduction.** The proposed methodologies appear to result in relatively high allocations (particularly given the State's draft allocation to SCAG) in areas without transit, or away from job-rich areas. This seems to go against the primary strategies for combating climate change, another State identified crisis. **The final methodology should focus more housing growth in areas with established or planned robust transit systems, and also in areas with established or planned robust job markets.**
2. **Emphasize Social Equity.** A minimum of the 150% social equity factor must be provided to avoid overconcentration of low-income units in jurisdictions that already have a higher share of those households. This point was raised by the City of Oxnard (9/11/19) and City of Los Angeles (9/13/19) in their comment letters, and the City of San Buenaventura concurs.
3. **De-emphasize Local Input.** As counter-intuitive as this may sound coming from a local jurisdiction, a methodology that weighs local input too highly will be more susceptible to challenge. We base this comment on our examination of the potential

allocations for cities within Ventura County. Option 3, which relied on local input from the RTP/SCS showed that some jurisdictions projected such low growth that they must have assumed they would not have another RHNA allocation ever. The City of San Buenaventura provided projections based on expected, continuous RHNA cycles, thus our numbers ended up being notably higher than another City in the county with a similar population. Therefore, use of a methodology that weighs local input too highly increases the potential for challenges that will distract focus away from updating our Housing Elements to achieve the State mandates.

As referenced by the City of Oxnard's review letter, expecting to solve the housing crisis in one cycle is not realistic. If the allocation SCAG is assigned remains in the ballpark of 1 million or more units, it is essential that the State provide local jurisdictions with relief managing such numbers. In recent years, legislation has been passed that made the RHNA process and reporting more difficult and added greater accountability. But those laws were based on a paradigm where the RHNA numbers were "manageable."

Therefore, we request that SCAG lead the effort to have Sacramento revisit legislation related to:

1. **Soften the Process of Identifying Housing Sites.** Recent legislation made it more difficult to identify housing sites. Nearly doubling the target, coupled with making it more difficult to identify sites, could lead to many communities being unable to find sufficient sites and not being able to get their Housing Elements certified. That will focus government energies away from housing construction.
2. **Soften Accountability for Meeting RHNA Targets.** If the SCAG region is assigned 1.3 M units for the 6th Cycle, most would agree that there is not enough labor and materials to build those units in the time period. So laws enacted to hold jurisdictions accountable for making progress on RHNA targets should be revisited because now it is likely that few jurisdictions will be able to make meaningful progress. We believe so long as jurisdictions plan for the units, and that there is no evidence that a jurisdiction is manipulating the system to avoid allowing these units, all established or implied threats of punishment should be lifted.

Lastly, in examining the methodology options for jurisdictions in the Ventura County region, most assign the County of Ventura with an equivalent share of growth as cities within Ventura County. The County is primarily rural and agricultural, and they are arguably the last area that should have significant housing growth. With the State's emphasis on infill development near transit, requiring the County to build the same share of units as cities does not make sense. We are not suggesting they should not have an allocation, but that their allocation should be less than cities. It is true that Option 3 provided the County of Ventura with a lower proportionate share, but Option 3 was based on the RTP/SCS projections which we identified earlier had a flaw in that some jurisdictions did not project reasonably expected growth mandates.

As the SCAG region is so expansive and diverse, we do not know if there are similar situations elsewhere, but in general, counties that do not have much developed area should not be held to the same level of development expectations as cities.

Thank you again for the opportunity to comment on the methodologies. Should your staff have any questions, please contact me at pgilli@cityofventura.ca.gov or (805) 658-4723.

Sincerely,

A handwritten signature in blue ink, appearing to read "PGilli", with a stylized flourish at the end.

Peter Gilli, AICP
Community Development Director

C: Alex McIntyre, City Manager
Akbar Alikhan, Assistant City Manager
City Councilmembers